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October 11, 2024

VIA ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Freeman et al. v. Giuliani, No. 24-mc-353 (LJL)
Freeman et al. v. Giuliani, No. 24-cv-6563 (LJL)

Dear Judge Liman,

Pursuant to Paragraphs I(C) and (D) of the Court's Individual Rules and Practices, Plaintiffs Ruby Freeman and Wandrea' Moss respectfully move to adjourn the conference currently scheduled for October 17, 2024 in the above-captioned cases. This is the first such request. Defendant Rudolph W. Giuliani joins in and consents to this request. Intervenor Andrew Giuliani also consents to this request.

For the reasons set forth below, and in light of counsel's unavailability due to the upcoming Sukkot holiday,¹ the parties request that the Court convene this conference on any of the following dates: **October 23, October 28, or October 29**. Counsel for Plaintiffs and Defendant are available on each of those three dates. Counsel for Intervenor is available on October 23 and 28, but not October 29. If the Court is not available for a conference on any of the proposed dates, the Parties are prepared to meet and confer and propose additional mutually convenient dates.

To ensure that these matters continue to proceed expeditiously, should this request be granted, the parties further agree and propose that the Court order as follows:

- Plaintiffs will file any reply to Defendant's opposition to summary judgment in No. 24-cv-6563 by October 23, 2024, or if the Court reschedules this conference for October 23, 2024, by 5:00 p.m. on October 22, 2024, which may enable the Court to hear argument on the motion for summary judgment at the conference should it wish to do so.

¹ The dates on which undersigned counsel is unavailable due to this holiday are October 17, 18, 24, and 25.

October 11, 2024

Page 2

- Counsel for Plaintiffs and Defendant will also confer and submit, not later than 5:00 p.m. on the day prior to the conference, a joint proposed schedule for expedited discovery in No. 24-cv-6563, so that the Court can order discovery to begin immediately if Plaintiffs' motion for summary judgment is not likely to be granted.
- Counsel for Plaintiffs will confer with counsel for Intervenor Andrew Giuliani and submit, not later than 5:00 p.m. on the day prior to the conference, a status report on any discovery and other anticipated proceedings in connection with Intervenor's claimed interest in the World Series rings.

The Parties respectfully submit that the short adjournment requested in this letter-motion is also advisable because it will allow Plaintiffs adequate time to review Defendant's opposition to the motion for summary judgment in 24-cv-6563, which is due October 16, 2024, prior to meeting and conferring on a proposed expedited discovery schedule and appearing before the Court. In addition, Defendant's brief in opposition to the Motion to Enforce Judgment (24-mc-353, ECF No. 44) and this Court's Memorandum and Order granting Plaintiffs' motion to quash (24-mc-353, ECF No. 53) have narrowed the remaining areas of dispute among the Parties, and permitting this short adjournment will permit the Parties to propose a maximally efficient schedule for resolving the remaining pending disputes.

Respectfully submitted,

s/ Aaron E. Nathan